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21 *Attorneys for Plaintiffs*

22 **U.S. DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA**

23 KRISTA O'DONOVAN, EDUARDO DE LA  
24 TORRE, and LORI SAYSOURIVONG,  
25 individually and on behalf of all others  
26 similarly situated,

27 Plaintiffs,

28 v.

29 CASHCALL, INC., a California corporation,  
30 and DOE 1 through DOE 50, inclusive,

31 Defendants.

32 CASHCALL, INC., a California corporation,

33 Counterclaimant,

34 v.

35 LORI SAYSOURIVONG and EDUARDO DE  
36 LA TORRE, individually and on behalf of all  
37 others similarly situated,

38 Counterdefendants.

39 Case No.: CV 08-3174-MEJ

40 **CLASS ACTION**

41 **STIPULATION AND ~~PROPOSED~~ ORDER  
42 REGARDING CASE DEADLINES**

43 Courtroom: B – 15<sup>th</sup> Floor  
44 Judge: Hon. Maria-Elena James

45 Complaint filed: July 1, 2008

1 Plaintiffs and Counterdefendants Eduardo de la Torre and Lori Saysourivong (“Plaintiffs”) and  
2 Defendant and Counterclaimant CashCall, Inc. (“Defendant”), through their respective counsel of  
3 record, stipulate as follows:

4 WHEREAS the parties have diligently engaged in discovery in this matter, including engaging in  
5 extensive good faith, meet and confer on discovery disputes;

6 WHEREAS the parties submitted a Joint Case Status Update on May 4, 2013;

7 WHEREAS in this Court’s May 7, 2013 Case Management Order, this Court set a deadline for  
8 expert reports of May 24, 2013, rebuttal expert disclosure of June 3 and discovery closure of June 18.

9 *See* Dkt. #137;

10 WHEREAS Plaintiffs submitted a Request for a Status Conference to Address Scheduling of  
11 Dates on April 23, 2013 in which they requested that the Court extend the case management deadlines  
12 set in its May 7, 2013 Order. *See* Dkt. #138;

13 WHEREAS the Court issued an Order granting Plaintiffs’ Request to Extend Case Management  
14 Deadlines on April 24, 2013. *See* Dkt. #139;

15 WHEREAS the current case management deadlines are as follows: All pretrial motions shall be  
16 filed and served by September 19, 2013, the hearing on dispositive motions shall be October 24, 2013,  
17 All factual and expert discovery must be completed by August 15, 2013, all expert witness reports shall  
18 be disclosed by July 19, 2013, and all rebuttal expert witness reports shall be disclosed by August 5,  
19 2013;

20 WHEREAS the parties now agree that a modest extension of time to complete discovery and  
21 expert reports is necessary;

22 NOW, THEREFORE, Plaintiffs and Defendant, through their respective counsel of record,  
23 stipulate, as follows:

24 The case management deadlines in the case shall be modified as follows:

25 Expert Disclosures September 18, 2013

26 Factual Discovery Cut-off September 18, 2013

27 Expert Discovery Cut-off October 15, 2013

1 Dispositive Motion Deadline October 17, 2013

2 Hearing on Dispositive Motions November 21, 2013

4 DATED: July 9, 2013

THE STURDEVANT LAW FIRM

5 ARTHUR D. LEVY

6 TERRELL MARSHALL DAUDT & WILLIE

7 By: /s/ Whitney Stark

8 Whitney Stark

9 Attorneys for Plaintiffs

10 DATED: July 9, 2013

MANATT, PHELPS & PHILLIPS, LLP

11 By: /s/ Brad W. Seiling

12 Brad W. Seiling

13 Attorneys for Defendant

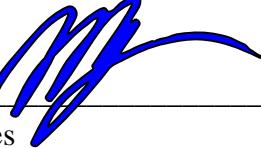
1 **[Proposed] Order**  
2

3 Having read the Parties' stipulation, the Court adopts its reasoning as the Court's own and orders  
4 that the deadlines in the case should be modified as follows:

5 Expert Disclosures September 18, 2013  
6 Factual Discovery Cut-off September 18, 2013  
7 Expert Discovery Cut-off October 15, 2013  
8 Dispositive Motion Deadline October 17, 2013  
9 Hearing on Dispositive Motions November 21, 2013

10 IT IS SO ORDERED.

11 Dated: July 10, 2013

12   
13 Maria-Elena James  
14 Chief United States Magistrate Judge

15  
16 *Filer's Attestation: Pursuant to General Order No. 45, Section X(B) regarding signatures, Brad Seiling*  
17 *hereby attests that concurrence in the filing of this document has been obtained.*